

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SEA CARRIERS LP I and :  
SEA CARRIERS CORPORATION :  
(individually and on behalf of those similarly :  
situated). : 07 CIV. 4658 (LAP)(MHD)

Plaintiffs, : **STIPULATION AND**  
- against - : **[REDACTED] ORDER TO**  
: **EXTEND TIME**

NYSE EURONEXT, et al., : ELECTRONICALLY FILED

Defendants. :  
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WHEREAS plaintiffs commenced this action by the filing of a complaint (the "Complaint") on or about June 1, 2007 and published notice of such filing in accordance with the Private Securities Litigation Reform Act of 1995 (the "PSLRA") on or about June 20, 2007; and

WHEREAS the process for the selection of lead plaintiff or lead plaintiffs and lead plaintiffs' counsel in accordance with the PSLRA has not yet been completed; and

WHEREAS the defendants that have been served to date have varying dates to answer, move, or otherwise respond to the complaint because they were served on different dates; and

WHEREAS counsel for plaintiffs have indicated that it is their intention to file an amended complaint; and

WHEREAS the parties have not previously moved for an extension of time in the above-captioned action; and

WHEREAS the undersigned attorneys for plaintiffs and the served defendants have conferred regarding issues of timing;

IT IS HEREBY STIPULATED AND AGREED:

1. Once a party or parties has or have been selected as lead plaintiff(s) and lead counsel has been appointed, such lead plaintiff(s) shall have the later of (i) seventy-five (75) days from the date of this Court's order appointing lead plaintiff(s) or (ii) December 4, 2007 within which either to file and serve an amended complaint or to notify the defendants in writing of their intention not to amend the Complaint.

2. All defendants served with the amended complaint (or the original Complaint if lead plaintiff(s) notify defendants of their intent not to amend) shall have seventy-five (75) days from the date of service of the amended complaint or a written notice of an intention of not amending the Complaint to answer, move or otherwise respond to the amended or original complaint, as applicable.

3. Subject to the provisions of paragraph 5 below, the lead plaintiff(s) shall have sixty (60) days from receipt of any motions to dismiss the complaint, either as amended or originally filed, to file their papers in opposition to said motions.

4. Defendants shall have sixty (60) days from receipt of the opposition papers of the lead plaintiff(s) in which to file their reply papers.

5. The parties to this stipulation shall meet and confer in order to negotiate a schedule for filing any motions to dismiss that appropriately reflects the number of said motions to dismiss that are to be filed and the number of issues that are presented. To the extent any defendant(s) obtain additional time beyond the time provided for herein to file such motions to dismiss, whether by agreement or as a result of an order of the Court, the

amount of time that lead plaintiff(s) shall have to file their opposition papers shall be extended for an equal additional period.

6. In the event some or all the defendants and the lead plaintiff(s) are unable to agree to a schedule as contemplated herein, either or both parties may seek the Court's intervention to resolve such disputes. Except as expressly set forth herein, nothing in this Stipulation and [Proposed] Order shall be deemed a waiver of any procedural or substantive rights of the parties or deemed to constitute consent to any procedural schedule.

7. Nothing in this stipulation constitutes a waiver of any defenses, including defenses based on lack of personal jurisdiction or improper service of process.

8. Those defendants that have been served as of the date hereof and that are a party to this stipulation (as specified in the below signature blocks of counsel) authorize their respective counsel to accept service on their behalf of any amended complaint filed by lead plaintiff(s) in this action.

Dated: August 24, 2007.

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SO ORDERED:

Loretta A. Preska

Hon. Loretta A. Preska (U.S.D.J.)

August 30, 2007